

JOSEPH E. DUNNE III
COLBY M. MAY*

*ALSO ADMITTED IN VIRGINIA

MAY & DUNNE

CHARTERED

ATTORNEYS AT LAW

1000 THOMAS JEFFERSON STREET, N.W.

SUITE 520

WASHINGTON, D.C. 20007

(202) 298-6345

RICHARD G. GAY
OF COUNSEL

TELECOPIER NO.
(202) 298-6375

January 31, 1992

REC'D MASS MED BUR
FEB 13 1992
VIDEO SERVICES

HAND DELIVER

RECEIVED

JAN 31 1992

Federal Communications Commission
Office of the Secretary

Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

RE: WHFT-TV, Miami, Florida, BRCT-911001LY

Dear Ms. Searcy:

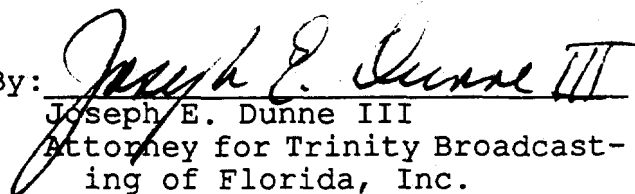
Transmitted herewith, on behalf of Trinity Broadcasting of Florida, Inc. (TBF), is an original and four copies of its "Further Motion For Extension of Time" filed in connection with the above-referenced proceeding.

Should any questions arise concerning this matter, kindly contact the undersigned directly.

Respectfully submitted,

MAY & DUNNE, CHARTERED

By:


Joseph E. Dunne III
Attorney for Trinity Broadcast-
ing of Florida, Inc.

JED:gmcB26

xc: All Per Attached Certificate of Service

RECEIVED

BEFORE THE

Federal Communications Commission

JAN 31 1992

WASHINGTON, D.C. 20554

Federal Communications Commission
Office of the Secretary

In Re: Application of:

TRINITY BROADCASTING OF FLORIDA,
INC.

For Renewal of License of
Commercial Television Station
WHFT-TV, Miami, Florida

To: The Commission

)
)
) File No. BRCT-911001LY
)
)
)
)
)
)

FURTHER MOTION FOR EXTENSION OF TIME

Trinity Broadcasting of Florida, Inc. ("TBF"), by its undersigned attorneys, and pursuant to section 1.46 of the Commission's rules and regulations, 47 C.F.R. § 1.46 (1991), hereby respectfully requests a further short extension of time within which to submit its opposition to the Petitions to Deny ("Petitions") filed by Glendale Broadcasting Company ("Glendale") on December 27, 1991 and the Spanish American League Against Discrimination (SALAD) on January 2, 1992. As grounds for its request TBF shows and states as follows:

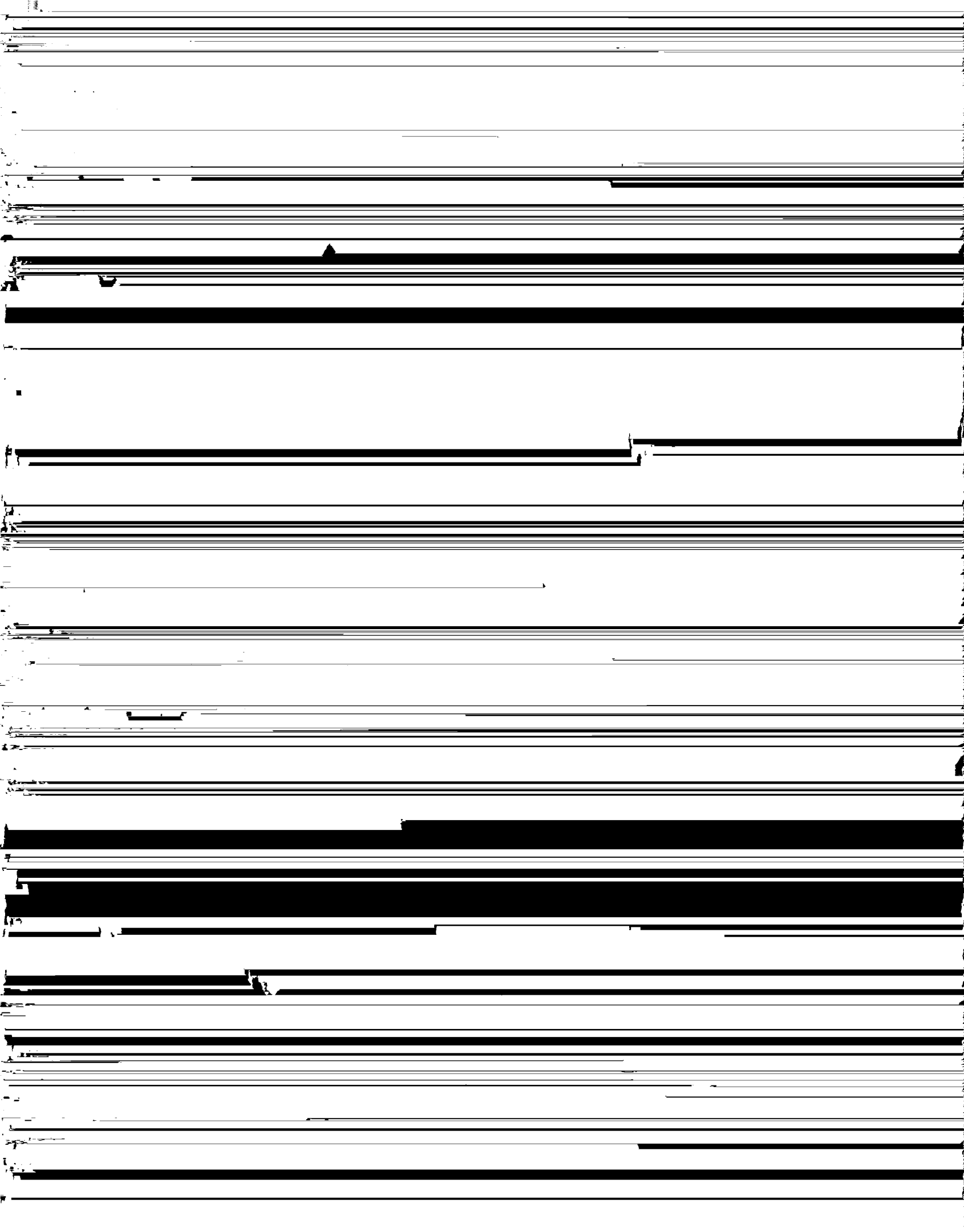
1. The Petitions raise issues which require the response not only of station employees but the applicant's principals. TBF's president, Paul F. Crouch, has been out of the country in Central America, was back in the country for only a few days, and is now leaving for Moscow for a week. These trips have been planned for some time, and complicated TBF's ability to respond.

2. In addition, TBF has retained co-counsel in this matter, the firm of Steptoe and Johnson, which has not had an opportunity to review the documents on which so much of the Petitions rely. At this point TBF is uncertain whether new counsel will be simply entering an appearance or what role it will play on TBF's behalf. An additional two weeks will allow new counsel to review the documents and TBF to determine what role it will play in the response.

3. TBF regrets the necessity for requesting a second extension of time in this matter, but notes that the extension requested herein is short, only two weeks in length, and does not inconvenience either the Commission's staff or the other parties to the proceeding. Both Petitioners will have ample opportunity to participate in the proceeding.

4. Counsel for SALAD has authorized the undersigned to represent that it will interpose no objection to the extension requested herein. Counsel for Glendale has been notified of this request.

WHEREFORE, the following premises considered, Trinity Broadcasting of Florida, Inc. respectfully requests a short extension of time, to and including February 17, 1992, to submit its opposition



CERTIFICATE OF SERVICE

I, Glinda M. Corbin, a secretary in the law offices of May & Dunne, Chartered hereby certify that I have caused to be sent this 31st day of January 1992, via first class U.S. mail, postage prepaid, a copy of the foregoing **FURTHER MOTION FOR EXTENSION OF TIME** to the following:

Lewis I. Cohen, Esq.
Cohen & Berfield, P.C.
1129 20th Street, N.W., Suite 507
Washington, D.C. 20036
(Counsel for Glendale Broadcasting Company)

Eduardo Peña, Esq.
Peña, Aponte and Tsaknis
1101 14th Street, N.W.
Washington, D.C. 20005

and

David Honig, Esq.
1800 N.W. 187th Street
Miami, Florida 33056
(Counsel for Spanish American League Against
Discrimination)

By: Glinda M. Corbin
Glinda M. Corbin